

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO  
POSTAL SERVICE WITNESS WILLIAMS

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the  
Greeting Card Association herewith submits interrogatories and requests for pro-  
duction of documents; specifically:

Interrogatories to Postal Service witness Williams:

GCA/USPS-T1-1 to -4

The term "documents" includes, without limitation, letters, telegrams,  
memoranda, reports, studies, articles from periodicals, speeches, testimonies,  
books, pamphlets, tabulations, and workpapers. In terms of format, "documents"  
includes written or printed records and disks, tapes, or other recorded media (to-  
gether with such written material as is necessary to understand and use such  
disks, tapes, or other media).

December 23, 2011

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T1-1

Please refer to your prefiled testimony at page 5, lines 14-22.

You state, at lines 19-22, that

The objective of the modeling exercise was to determine whether excess capacity could be reduced significantly within the network if service obligations and operating constraints driven by current overnight First-Class Mail service standards were changed.

(a) Please state whether, before the modeling exercise just described was initiated, or simultaneously, or subsequently, the Postal Service performed any similar exercise to determine whether excess capacity could be reduced significantly without changing the current overnight standard for First-Class Mail. If your answer is not an unqualified "no," please describe fully any such modeling exercise and provide any documents setting forth, explaining, or evaluating it.

(b) Should the reference to overnight First-Class Mail service standards in the quoted passage be understood as covering overnight service for Periodicals as well as for First-Class Mail? If your answer is negative, or if there are differences between the overnight standards for these classes, please explain fully.

GCA/USPS-T1-2

Please refer to your prefiled testimony at page 17, line 22, through page 18, line 2. You state that First-Class Mail, which is declining in volume, has "historically been the primary source of funding for mail processing and delivery infrastructure."

Did the Postal Service give consideration to seeking increased levels of processing and delivery infrastructure funding from other classes of mail, either (i) as an alternative to elimination of First-Class overnight delivery or (ii) as an independent deficit-reduction measure? If your answer is not an unqualified "no," please describe such consideration fully, and provide any documents setting forth, explaining, or evaluating it.

GCA/USPS-T1-3

Please refer to your prefiled testimony at page 16, lines 12-15, and fn. 17.

(a) In arriving at the conclusions expressed in the cited passages, did you consider the cumulative effect on Single-Piece First-Class Mail entry of –

(i) The Retail Access Optimization Initiative, currently before the Commission in Docket No. N2011-1; and/or

(ii) The potential elimination of Saturday street delivery and pickup, substantially as set forth in the proposal presented in Docket No. N2010-1; and/or

(iii) Any existing or future Postal Service actions to reduce the number of street collection boxes, and/or

(iv) The possibility of an exigency-based rate increase, as proposed in Docket No. R2010-4R, in combination with a price-capped increase early in 2012,

when combined with the Mail Processing Network Rationalization plan (hereafter, "MPNR plan")?

If your answer to any of (i) – (iv) is other than an unqualified "no," please describe such consideration fully, and provide any documents explaining or evaluating such consideration or the effect(s) being considered.

(b) You state that the potential impact of the MPNR plan on Single-Piece First-Class entry would be "much less significant" (USPS-T-1, page 16, line 13). Did you attempt to quantify or otherwise make more specific that potential impact? If so, please (i) describe your procedure and results, (ii) state whether this exercise included distinguishing between transactional and non-transactional uses of Single-Piece First-Class Mail and describe any differences in impact as between these two categories, and (iii) provide any documents setting forth, explaining, or evaluating that procedure and those results, as specified in both (i) and (ii).

#### GCA/USPS-T1-4

Please refer to your prefiled testimony at page 19, lines 8-12.

Are the "additional sortation or other mail preparation" activities which enable a bulk mailer to retain overnight delivery for mail entered after the Day Zero Critical Entry Time specified in a Postal Service rule, publication, or other publicly available source? If so, please provide such source(s) or state how they may be accessed.